

EXHIBIT 16

ORIGINAL

UUSI v. STIEG, ET AL

NORMAN RAUTIOLA

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Prepared by

Network Reporting
— STATEWIDE COURT REPORTERS —

depos@networkreporting.com
Phone: 800.632.2720
Fax: 800.968.8653
www.networkreporting.com

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1 **A** I don't know the names of Nartron employees in the plant. I
2 may know of some of them, but I don't know their names.

3 **Q** So individuals who were employed by Nartron were involved in
4 the manufacture of the lids is what you're saying; is that
5 correct?

6 **A** Yes.

7 **Q** Were their wages then paid by Nartron?

8 **A** Yes.

9 **Q** Do you have any idea how many individuals were manufacturing
10 those -- involved in the manufacturing of the lids?

11 **A** No.

12 **Q** And when I say "manufacture," I'm talking about the actual
13 physical creation of those items. Is that --

14 **A** Yes; I understand that.

15 **Q** In 2016 were any Tattler Home Products -- individuals
16 employed by Tattler Home Products manufacturing those lids?

17 **A** No.

18 **Q** And were those Nartron employees again?

19 **A** Nartron employees would be operating the molding machines
20 and would perform the packaging and shipping operations.

21 **Q** All right. Did Nartron file any tax returns that indicated
22 that Nartron was involved in the manufacture or shipping of
23 the lids?

24 **A** I would have to examine the tax returns to determine exactly
25 how that was filed.

1 listed here that may have an interest in the production of
2 the canning lids that you've identified that are being
3 manufactured by Nartron employees?

4 **A I don't think so.**

5 **Q** Is there a way for you to check to see if that's true?

6 **A I just did. I reviewed my frontal cortex and cerebrum and**
7 **the answer came no.**

8 **Q** All right.

9 MR. WOTILA: I'll take a minute to review some
10 documents. I don't think I'll have to go over these with
11 Mr. Rautiola at this time, but let me see if there's
12 anything else. This will take two or three minutes.

13 MR. KOSTOPOULOS: That's fine.

14 (Off the record)

15 **Q** Regarding the production of the canning lids at the
16 facility, are you still using the original equipment that
17 was delivered from Colorado?

18 **A Yes.**

19 **Q** Has it been modified in any way?

20 **A I don't think so, but I don't know that.**

21 **Q** All right. Who would know whether it's been modified?

22 **A I would typically know that.**

23 **Q** Okay. And you don't know --

24 **A But since I don't know everything that's going on out there**
25 **with the mold operator and on and on and on, but in the**

1 **normal course of business I would know that.**

2 Q And as of this date you have not been informed in your
3 normal course of business of any modifications to that mold?

4 A **Now, you've specified to the mold. The answer is, yes,
5 there have been no changes to the mold to the best of my
6 ability, nor to any other equipment that was delivered to us
7 from S&S in Colorado.**

8 Q All right. So basically the mold that's being used to
9 produce the lids is the same condition, if you will, other
10 than perhaps some wear and tear, now that it was when it was
11 delivered from Colorado?

12 A **Yes.**

13 Q Does Edward Cox work for any of your business entities,
14 including Nartron?

15 A **Yes.**

16 Q Is he still employed there?

17 A **Yes.**

18 Q Does David Shank still work for any of your entities?

19 A **Yes.**

20 Q And he's still employed there?

21 A **Yes.**

22 Q Again, looking at what's been marked as Exhibit 16, which is
23 the U.S. Patent Application Publication, who would
24 physically prepare these 16 pages for the application, if
25 you know?